## Internal Revenue Service memorandum

date: FEB 0 6 1991

to: Director, Internal Revenue Service Center

Kansas City, MO

Attn: Entity Control

from: Technical Assistant

Employee Benefits and Exempt Organizations

subject: CC:EE:3 - TR-45-1614-90

Railroad Retirement Tax Act Status

Attached for your information and appropriate action is a copy of a letter dated December 3, 1990, from the Railroad Retirement Board concerning the status under the Railroad Retirement Act and the Railroad Unemployment Tax Act of the:

We have reviewed the opinion of the Railroad Retirement
Board and concur in the conclusion reached by the Board that
became an employer,
within the meaning of Section 3231 of the Internal Revenue
Code, on
the date on which operations commenced
and employees were first compensated. It should file a Form
CT-1 for and Forms 941-E should be filed for the
appropriate periods of

(Signed) Ronald L. Moore

RONALD L. MOORE

Attachment: Copy of letter from the Railroad Retirement Board

cc: Mr. Gary Kuper Internal Revenue Service 200 South Hanley Clayton, MO 63105